# Baker McKenzie.

#### Inflation Reduction Act – Transferable Tax Credits

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## 01 Introduction

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#### Inflation Reduction Act of 2022: Overview

- Signed into law on August 15, 2022.
- Largest investment in clean energy and climate change by US.
  - Projected to significantly reduce greenhouse gas emissions by 2030.
  - Promises over \$700 billion for energy and climate change, with over \$370 billion of funding to provide tax credits for clean energy projects.

### Transferable credits expanded or added by IRA

- Clean energy production.
  - Section 45 Credit for electricity produced from certain renewable resources.
  - Section 45Y Clean energy production credit (technology neutral).
  - Section 45V Clean hydrogen production credit.
  - Section 45U Zero emission nuclear power production credit.
  - Section 45Z Clean fuel production credit.
- Clean energy investment.
  - Section 48 Energy credit.
  - Section 48E Clean electricity investment credit (technology neutral).

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### Credits expanded or added by IRA and CHIPS Act

- Carbon capture and sequestration.
  - Section 45Q Credit for carbon oxide sequestration.
- Manufacturing.
  - Section 45X Advanced manufacturing production credit.
  - Section 48C Advanced energy project credit.
- Clean vehicles.
  - Section 30C Alternative fuel vehicle refueling property credit.





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#### Title search: Transferable Energy Tax Credits

Also available as part of the eCourse 2023 Taxation eConference: Day 1 - Focus on Business Planning

First appeared as part of the conference materials for the  $71^{\rm st}$  Annual Taxation Conference: Day 1 - Focus on Business Planning session "Transferable Energy Tax Credits"